

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JENNIE COURTNEY,
AS ADMINISTRATRIX OF THE
ESTATE OF DENNIS COURTNEY,
DECEASED,

PLAINTIFF,

v.

ANTHONY CLARK, et al.

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CIVIL ACTION NO.:
2:06-CV-00600-MHT
(Removed from the Circuit Court of
Covington County, AL; CV-06-110)

BRIEF IN SUPPORT OF MOTION TO AMEND COMPLAINT

COMES NOW the Plaintiff, Jennie Courtney as Administratrix of the Estate of Dennis Courtney, deceased, by and through the undersigned counsel of record, and files this Brief in Support of Motion to Amend Complaint and as reasons in support of states as follows:

1. Plaintiff filed her First Amended Complaint on November 1, 2006.
2. Some of the substantive changes made to the original complaint involved the following parties: Sheriff Anthony Clark, Deputy Jerry Wayne Edgar, and Deputy Walter Inabinett.
3. The Second Amended Complaint will strike the specific counts and facts against Sheriff Anthony Clark, Deputy Jerry Wayne Edgar, and Deputy Walter Inabinett as added in the First Amended Complaint.
4. Defendants Sheriff Anthony Clark, Deputy Jerry Wayne Edgar, and Deputy Walter Inabinett do not object to the Plaintiff's Motion to Amend her First Amended Complaint.

WHEREFORE PREMISES CONSIDERED, Plaintiff by and through the undersigned counsel of record respectfully submits this Brief in Support of Motion to Amend Complaint.

Respectfully submitted,

/s/ Britt V. Bethea

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CERTIFICATE OF SERVICE

I hereby certify that on this the 4th day of December 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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and by sending via U.S. Mail, postage prepaid, to the following:

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/s/ Britt V. Bethea
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